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Presentment Date: January 20, 2011 at 12:00 p.m.

Objection Deadline: January 20, 2011 at 11:00 a.m.

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L.
Madoff*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

**NOTICE OF PRESENTMENT OF TRUSTEE'S MOTION
FOR ENTRY OF AN ORDER ESTABLISHING PROCEDURES
FOR SERVING COMPLAINTS AND EXHIBITS FILED UNDER SEAL**

PLEASE TAKE NOTICE that upon the Trustee's Motion for Entry of An Order Establishing Procedures for Serving Complaints and Exhibits Filed Under Seal (the "Motion") of

Irving H. Picard, as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC, under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff, the undersigned will present the attached proposed order (the “Order”) to the Honorable Burton R. Lifland, United States Bankruptcy Judge, for signature and entry on **January 20, 2011, at 12:00 p.m.**

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must: (i) be made in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York and other applicable rules and guidelines; (iii) be filed, in accordance with General Order M-399, electronically with the Bankruptcy Court, with a hard copy marked “Chambers Copy” delivered, pursuant to Local Rule 9070-1, to the Chambers of the Honorable Burton R. Lifland, One Bowling Green, New York, New York 10004, and served upon the following: (a) Baker & Hostetler LLP, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, Esq., and Marc Hirschfield, Esq.; and (b) Securities Investor Protection Corporation, 805 Fifteenth Street, N.W., Suite 800, Washington, D.C. 20005, Attn: Kevin H. Bell, Esq., so as to be received no later than **January 20, 2011, at 11:00 a.m. (the “Objection Deadline”).**

PLEASE TAKE FURTHER NOTICE that unless a written objection to the Motion with proof of service is filed with the Court by the Objection Deadline, the relief requested shall be deemed unopposed, there will not be a hearing and the Bankruptcy Court may enter an order granting the relief sought.

PLEASE TAKE FURTHER NOTICE that if an objection to the Motion is timely filed, a hearing may be held before the Honorable Burton R. Lifland, United States Bankruptcy Judge, at a date to be scheduled by the Court, upon such additional notice as the Court may direct. The

moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: New York, New York
January 11, 2011

BAKER & HOSTETLER LLP

By: /s/Marc Hirschfield
David J. Sheehan
Marc Hirschfield
Judith A. Selby

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